

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS and BROOKE
SCHREIER GANZ,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
VETERANS AFFAIRS, including its
Components, the Office of General Counsel,
the Veterans Benefits Administration,
and the Veterans Health Administration,

Defendant.

NOTICE OF MOTION

18 Civ. 8449 (PAE)

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of its Motion for Summary Judgment, the Declaration of Deana M. Marakowski and exhibits thereto, the Declaration of John F. Quinn III, the Declaration of Derek Herbert, and the Declaration of Sharanya Mohan and exhibit thereto, defendant the United States Department of Veterans Affairs, by its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New York, respectfully moves for summary judgment pursuant to Federal Rule of Civil Procedure 56.

Dated: New York, New York
July 5, 2019

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

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